

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF BENJAMIN
STEINMETZ FOR AN ORDER TO TAKE
DISCOVERY FROM VALE S.A., VALE
AMERICAS, INC., RIO TINTO PLC, AND
RIO TINTO LIMITED PURSUANT TO 28
U.S.C. § 1782

Case No. 1:20-mc-00212

**AFFIDAVIT OF
VICTORIA R. MORRIS**

Pursuant to Local Rule 1.3(c), I, Victoria R. Morris, certify as follows:

1. I am an associate of the law firm of Kobre & Kim LLP.
2. I submit this affidavit in support of my motion for admission *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bars of the state of Florida and the District of Columbia.
4. I have never been convicted of a felony.
5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
6. There are no pending disciplinary proceedings against me in any State or Federal court.

I respectfully request that I be permitted to appear as counsel and advocate *pro hac vice* in this application for Applicant Benjamin Steinmetz.

Dated: May 28, 2020

Respectfully submitted,

/s/ Victoria R. Morris

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Counsel for Applicant

Sworn to before me this
28th day of May, 2020



Notary Public
Lisa M. Tucker

